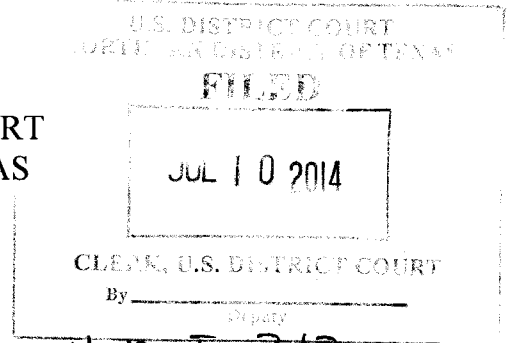


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

WILLIAM LEE MAGLICCO (01)  
ERICA MICHELE GIBSON (02)

No. 4:14-MJ-313

CRIMINAL COMPLAINT

I, Inspector Thomas Y Hiter, II, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about March 28, 2014, in the Fort Worth Division of the Northern District of Texas, defendants **William Lee Maglicco** and **Erica Michele Gibson**, aided and abetted by each other, did unlawfully have in their possession the contents of mail, that is, a First Class letter addressed to H.L. of Southlake, Texas, which had been stolen, taken, and abstracted from a mail receptacle, which was an authorized depository for mail matter, knowing said item to have been stolen, all in violation of 18 U.S.C. §§ 1708 and 2.

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS), and have been so employed for the past nine years. I am currently assigned to the Mail Theft/Violent Crimes Team for the Fort Worth Division, and I am responsible for investigating mail theft, robberies, burglaries, threats, assaults, counterfeiting and identity theft cases involving the U.S. Mail.
2. On or about April 2, 2014, I was contacted by United States Postal Inspector K. Martin regarding complaints of stolen mail from addresses in the Roanoke, Texas, area.

After speaking with several residents, it was determined that mail thefts had occurred in the cities of Roanoke, Southlake, and Keller, Texas. I contacted the Police Departments of the affected cities to inquire about reported cases of mail theft. I was able to speak with Detective J. Sutton of the Southlake police department who stated he had received several reports of stolen and rifled mail in the city limits of Southlake, including an individual by the name of H.L.

3. On or about April 2, 2014, I made contact with H.L. of Southlake. H.L. stated he was contacted on or about March 27, 2014 by American Express concerning charges to a credit card that had been mailed to him but not yet activated. H.L. informed American Express that he had not received the card in question. American Express provided me information concerning this credit card with the last four digits 1006. I began contacting the businesses where this card was used to obtain security video to identify the user.

4. On or about April 4, 2014, I contacted Wal-Mart in Grapevine, Texas, concerning the use of an American Express credit card ending in 1006 on March 25, 2014. An Asset Protection Manager researched the transaction and was able to provide video and a copy of the transaction receipt. On the video, a male and female were observed attempting to use the card that was identified as stolen by H.L. of Southlake.

5. On or about April 4, 2014, I met with Detective Sutton to compare notes and review video obtained from businesses and residents in an attempt to identify a vehicle or an individual seen in the videos. Detective Sutton and I compared multiple videos and determined the same vehicle or individuals were observed in each video.

6. On April 9, 2014, I was contacted by Detective Sutton who informed me he had identified the vehicle and owner, who looked similar to an individual observed in surveillance videos, as William Lee Maglicco. Detective Sutton also provided me with information of an arrest of William Lee Maglicco and Erica Gibson in North Richland Hills on January 22, 2014, when both individuals were in possession of stolen mail and narcotics.

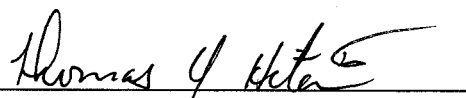
7. On April 11, 2014, Southlake Police, with assistance from Watauga Police, executed a search warrant at 6229 Stardust Drive South, Watauga, Texas, the residence of Maglicco. During the search warrant officers discovered hundreds of pieces of mail addressed to individuals other than Maglicco or his residence. Among the many pieces of recovered mail were pieces from victims known to Southlake Police and me, including mail addressed to H.L. referencing an American Express credit card with the last four digits 1006. Also recovered were several credit/debit cards, bank statements, passports, and tax information.

8. On April 23, 2014, I interviewed Maglicco at the North Richland Hills city jail. Maglicco was administered his Miranda Warning and Waiver of Rights. He chose to waive those rights by submitting to an interview. Upon questioning, Maglicco admitted to stealing mail and storing it at his residence. Maglicco admitted that he stole mail approximately two to three times per week from residential mailboxes with his girlfriend, Erica Michele Gibson, from multiple cities including Southlake. Maglicco stated he stole mail to fuel his and Gibson's drug habit.

Maglicco stated he would use credit cards and gift cards located inside of the stolen mail to purchase items for himself and Gibson. Maglicco stated "I'd go shopping." Maglicco stated many of the attempts with credit cards were denied, but he was able to purchase gasoline and food at convenience stores.

9. On April 24, 2014, I interviewed Gibson at the Tarrant County jail. Gibson was administered her Miranda Warning and Waiver of Rights. She chose to waive those rights by submitting to an interview. Upon questioning, Gibson admitted to stealing mail and keeping it at the residence of her boyfriend, Maglicco. Gibson stated she and Maglicco would go out at night and steal mail, but she was "too f\*\*ked up" to remember all the cities they visited. Gibson stated they were out several times per week stealing from residential mailboxes. Gibson stated they used the stolen cards to buy gas for Maglicco's car.

10. Based upon the foregoing facts and information, I submit there is probable cause to believe that Maglicco and Gibson have violated 18 U.S.C. § 1708.

  
Thomas Y Hiter, II  
US Postal Inspector

Sworn to before me, and subscribed in my presence on ~~June~~ <sup>July</sup> 10, 2014  
at 2:05 p.m., at Fort Worth, Texas.

  
JEFFERY CURETON  
United States Magistrate Judge